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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WILLIAM LEONARD PICKARD,) Case No.: 3:06-cv-00185-CRB
Plaintiff,)
v.)
DEPARTMENT OF JUSTICE,)
Defendant.)

Date: March 28, 2014
Time: 10:00 a.m.
Place: Ctrm. 6, 17th Floor
Hon. Charles R. Breyer

Subject to the approval of the Court, the parties hereby stipulate to modify the summary judgment briefing schedule and hearing date. Good cause exists for this request as follows:

The Court granted the parties' stipulation on summary judgment briefing on November 1, 2013 (ECF No. 183). Defendant filed its fourth motion for summary judgment on January 7, 2014 (ECF No. 184). Plaintiff's cross-motion for summary judgment and opposition is currently due January 21, 2014. However, the current briefing schedule provides only two weeks to prepare plaintiff's filing. Although plaintiff's counsel previously believed two weeks would be sufficient to prepare the motion, litigation deadlines in other cases shifted over the holidays, and have thus far prevented counsel from preparing the motion. Plaintiff thus seeks a one-week continuance for the filing of his cross motion and an according one-week adjustment to the case's remaining deadlines.

The new schedule, as stipulated by the parties, is as follows:

- (1) Plaintiff's Cross-Motion and Opposition to Defendant's Summary Judgment is due January 28, 2014;
- (2) Defendant's Opposition to Plaintiff's Cross-Motion and Reply in Support of Summary Judgment is due February 18, 2014;
- (3) Plaintiff's Reply in Support of Summary Judgment is due March 4, 2013;
- (4) Hearing on cross-motions scheduled for April 4, 2014.

The parties respectfully request that the schedule above be adopted in place of the schedule previously proposed. The page limits remain the same as before.

Dated: January 17, 2014

Respectfully submitted,

By: /s/ Mark Rumold
MARK RUMOLD
Counsel for Plaintiff

MELINDA HAAG
United States Attorney

Dated: January 17, 2014

By: /s/ Neill T. Tseng
Neill T. Tseng
Assistant United States Attorney
Counsel for Defendant

* * *

DECLARATION PURSUANT TO LOCAL RULE 5-1

I, Mark Rumold, attest that I have obtained the concurrence of Neill T. Tseng, Counsel for Defendant, in the filing of this document.

Executed on January 17, 2014, in San Francisco, California.

/s/ Mark Rumold
Mark Rumold

PURSUANT TO STIPULATION, IT IS SO ORDERED.

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2 DATED: January 17, 2014
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